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August 29, 2013

VIA FACSIMILE: (212) 805-6737

The Honorable George B. Daniels
United States District Judge
United States District Court – Southern District of New York
500 Pearl Street, Courtroom 11A
New York, NY 10007

Re: Joyce De La Rosa v. Tiago Holdings, LLC et al, 13-CV-695 (GBD)

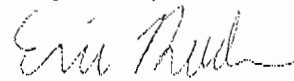
Dear Judge Daniels:

This firm represents defendants Tiago Holdings, LLC ("Tiago") and Central Parking Systems of New York, Inc. ("Central Parking") in the above-captioned Americans with Disabilities Act matter. We write jointly with Plaintiff's counsel to request a 60 day extension of the parties' time to complete discovery. In addition, the parties respectfully request an adjournment of the case management conference, currently scheduled for September 5, 2013 at 9:30 am, for a date and time that is convenient for the Court. A proposed revised scheduling order reflecting updated deadlines is annexed hereto for your consideration and endorsement. This is the first such request for an extension of these deadlines.

The extension is necessary because the parties are engaged in settlement discussions and want to focus their time and resources on achieving a resolution. To this end, the parties have scheduled a site visit for September 10, 2013.

Thank you for your consideration of this request.

Respectfully,



Eric W. Ruden

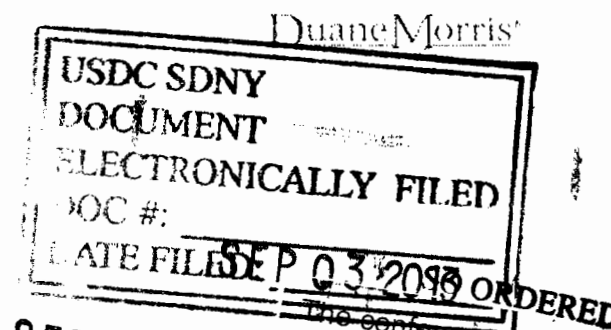
Enclosure

cc: Glen Parker (via email: ghp@parkerhanski.com)

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SEP 03 2013

The conference is adjourned to November 5, 2013 at 9:30 a.m.

George B. Daniels
HON. **GEORGE B. DANIELS**

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